Refugee Reports

A Project of the American Council for Nationalities Service
815 Fifteenth Street NW, Suite 610 Washington, DC 20005 (202) 667-0782

Volume VIII, Number 11 November 13, 1987

INS PROPOSES UNIFORM POLICY ON DETENTION AND RELEASE OF JUVENILES

On any given day, somewhere between 150 and 200 alien children are held in detention by the Immigration and Naturalization Service (INS). Most are processed quickly. Because children in INS detention represent a "rolling" population, the number who enter INS custody during the course of a year averages about 10,000. Mexican juveniles are most likely to opt for voluntary departure and leave almost immediately after apprehension; most others are deported or released within one or two weeks.

For a smaller percentage of these children, however, detention is not short term. Some have been held for as long as a year. Most have been from El Salvador, and smaller numbers from Guatemala and Nicaragua. Oftentimes these children remain in detention for extended periods of time because their undocumented parents in the United States are unwilling to come forward to claim them for fear that they too would then be subject to deportation.

Over the past several years, INS policies for handling this situation have varied considerably from region to region. The largest numbers held have been in California, where release policies have been the most restrictive. These policies have been subject to a great deal of criticism, including law suits.

Now, the INS has published proposed regulations that would establish a more uniform nationwide policy for the treatment of juveniles in exclusion and deportation proceedings.

The proposal, published in the October 15 Federal Register, defines "juveniles" as aliens under the age of 18; creates a new position of "Juvenile Coordinator" in the INS central office responsible for placing children "for whom detention is determined to be necessary" in appropriate juvenile facilities; introduces a procedure for cases where there are conflicts between the child and the parents; provides factors to consider in determining whether to release juveniles; and ranks in order of priority who should take custody of paroled children.

Paroled children, the regulations state, should be released by the INS in order of preference to:

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1) a parent, legal guardian, or adult relative not in INS detention;
2) an adult relative or legal guardian in INS detention, who would be released together with the child on a case-by-case basis;
3) a person designated by the parent or legal guardian in a sworn affidavit; or
4) in "unusual and compelling circumstances" another adult "who executes an agreement to care for the juvenile's well being and to ensure the juvenile's presence at all future proceedings before the INS or an immigration judge."

Regulations Fail to Address Key Issue, Critics Charge Although the proposal appears to be a direct INS response to litigation and other advocacy efforts, it still falls short of the reforms demanded by those working on behalf of children in INS detention.

At the heart of the issue for many critics has been the policy in the INS western region of releasing children only to their parents. Critics have charged that children have been held as "bait" to force undocumented parents to turn themselves in.

"The proposal doesn't resolve the issue about what to do if an undocumented parent wants the child released to another responsible adult," said Lynn Alvarez an attorney in the Immigrants' Rights Office of the Legal Aid Foundation of Los Angeles.

Richard Parkins, director of a project on detained children for International Social Services/American Branch (ISS/AB), said that "child welfare considerations should take precedence over enforcement considerations" and that release to an undocumented parent is often the only option and "the one most likely to serve the interests of the child."

Parkins suggested that an intermediary be used to "broker" the reunification of children and their undocumented parents.

Carlos Holguin of the National Center for Immigrant Rights, Inc. added that as a practical matter many parents can't afford to travel the distances required to pick up children from INS detention centers that are often in remote locations. He suggested that parents be permitted to designate another responsible adult before a notary public to pick up their children.

The INS, however, insists that the proposal adequately addresses these concerns. Mary Ruth Calhoun, INS juvenile detention specialist, said, "If the parents come forward, they will not be detained. It is not our intention to detain anyone."

Calhoun did say, however, that undocumented parents, although not detained, would be "put under docket control" making them subject to deportation. "We have to follow the law," she said. "No one wants to detain children. It's a no win, high liability situation. But every Service employee in the field has to follow the law."

Having been criticized for years for its failure to have a uniform national policy for the detention and release of alien minors, INS's proposed regulations are now being criticized by people in regions that had had more liberal release policies than the western region.

Ninfa Krueger, executive director of the Border Association for Refugees from Central America, said that before the new proposal was announced, children apprehended in the Rio Grande valley were not being taken into custody, but rather could sign I-270 forms giving them 30-day extended voluntary departure. During that month, she said, they were allowed to travel and could often contact lawyers to reverse the voluntary departure. Within the past two months, however, she said that all children are being detained and that about 40 have been transferred to holding facilities outside that INS sector.

"The effect now is to institutionalize detention," said Jonathan Moore of Proyecto Libertad in Harlingen, Texas. He reported that in mid-October, 13 undocumented children apprehended in the Rio Grande Valley were sent to the INS detention facility in Laredo. "This is a step in the wrong direction for us," he said.

Regulations Respond to Suit, Panel Recommendations The recently published proposed regulations come in the wake of litigation and other advocacy efforts for a more uniform policy regarding minors.

In 1985, the National Center for Immigrants' Rights, Inc., the National Center for Youth Law, and the ACLU Foundation of Southern California filed a class action suit, Flores v. Meese, challenging an INS practice of refusing to release juveniles on bail unless a parent or legal guardian

Five-year-old Carlos Alberto Aparicio was apprehended at the bottom of a canyon about one-mile north of the Mexican border in July 1986.

At the time, U.S. Border Patrol agent Alan Fliason, who held the Guatemalan boy in his lap, told the San Diego Union that he would not "prosecute" the parents if they came forward to claim their son, but that they would be identified and scheduled for deportation hearings if they were here illegally.

Photo by Union Tribune Publishing Co.

personally appeared to take custody of them (see Refugee Reports, Vol. V, Nos. 19 and 20). The suit termed the INS policy "a thinly veiled device to apprehend the [undocumented] parents of incarcerated juveniles and to punish children for allegedly having entered the United States without lawful authority."

The suit resulted from a policy announced by INS Western Regional Commissioner Harold W. Ezell on September 6, 1984, stating, "No minor shall be released except to a parent or legal guardian." While announced in the INS western region, the policy was not followed consistently in other regions.

Jenny Flores, a 15-year-old Salvadoran, was arrested by INS agents in 1985 and detained in Pasadena, California. She was charged with being deportable for entering the country illegally, but not charged with having committed any crime.

Although she was able to post bail, the INS refused to release Jenny to an adult other than her parent. Her mother, the suit said, refused to appear before INS agents to accept custody of Jenny because "she fears she will be taken into custody and deported to El Salvador, where a civil war currently exists."

Jenny remained in detention for two months, during which she shared sleeping quarters with 12 unrelated women, five of whom were adults. She was finally released on the order of a U.S. district judge to a "quasi-guardian."

The suit also challenged conditions in which Jenny and other children were being held, including:

- holding them with unrelated adults;
- failing to provide them with adequate educational and reading materials;
- denying them adequate recreation;
- denying them reasonable visitation with family and friends;
- subjecting them to strip or body cavity searches after meetings with their lawyers, appearances at hearings, and at other times.

Court Rules Alien Minors Have Due Process Rights In a related case, Perez-Funez v. District Director, INS, a U.S. district judge found that while the INS had not been shown to engage in overt coercion, the agency's detention of unaccompanied minors was

inherently coercive" and certain of its policies unconstitutional.

U.S. District Judge Edward Rafeedie required the INS to inform unaccompanied alien children over the age of 14 from countries other than Mexico and Canada of their right to telephone a relative, friend, or a free legal services organization before being presented with the prehearing voluntary departure form.

Attorneys for the children alleged that the INS had been pressuring children to sign voluntary departure forms out of ignorance and fear. By signing these forms (I-274s), aliens waive the right to a deportation hearing and consent to summary removal from the United States. Those who choose this option are released quickly and have no negative record to hinder future legal admission to the United States.

The judge ruled that the children must be advised of their rights, including the right to claim political asylum, and required the INS to provide updated lists of free legal services agencies for the minors' benefit.

Research, Panel of Experts, Question Effects of Detention on Minors In a related development, the Refugee Policy Group (RPG) submitted a 73-page report to International Social Services/American Branch (ISS/AB) which draws attention to the problems faced by many alien minors under INS jurisdiction. The report was the focal point of a series of discussions involving a panel of experts in the field and representatives of the INS.

Based on those discussions, ISS/AB has recommended that children should be released from INS custody as soon as possible, and that minors whose undocumented parents are unwilling to come forward to claim them should be released to other responsible adults, perhaps through agreements with child welfare service providers.

ISS/AB recommended that "detention should be regarded as an exceptional situation and, when imposed, should involve as unrestricted an arrangement as possible, such as foster or licensed group home care."

The report, Minors in Immigration Proceedings: Problems of Child Welfare and Immigration Enforcement, discusses site visits to a variety of facilities holding minors in INS proceedings. "In some places, at some times," the report finds, "the absence of specific policies related to detention and release of minors has translated into a flexible, common sense approach that has worked to the benefit of the apprehended children. Miami and Houston are two cases. At other times, however, the results have been less desirable: lengthy stays of detention in prison-like facilities; separation of children from their parents; absence of adequate legal representation; and unwillingness on the part of either immigration officials or child welfare officials to take responsibility for undocumented youth."

Prison-Like Conditions in INS Contract Facilities The report was especially critical of conditions in INS contract facilities and juvenile detention centers. As of April 1986, 62 percent of all minors held by the INS were being detained in contract facilities.

No matter how sympathetic the staff in such facilities, the report said, they nevertheless represent prison-like environments. "For the sake of security, windows and doors are locked and guarded, visiting is limited, and detainees searched--or visitors prohibited. In all of the facilities detainees are punished for rule infractions, in various ways, usually by stays of up to 72 hours in solitary confinement."

The situation was found to be particularly troubling when alien children were placed in county juvenile corrections facilities. This usually occurs in areas with relatively few alien minor apprehensions. "Because they have not committed a crime," the report said, "the aliens are kept separately from the rest of the population in most facilities." The result, however, is that these children are often held in solitary confinement as a means of segregating them.

In the Alameda County Juvenile Hall in San Francisco, for example, the report found that "it is not unusual for there to be only one alien juvenile in the solitary section, who therefore has no peer companionship whatsoever and is without the recreational and educational benefits that the other juveniles enjoy." The report noted the case of one 15-year-old boy who, after being held in solitary confinement for 7 months, was finally allowed to join the other juvenile inmates in recreational activities.

Justice Department Funds New Shelter Facilities for Children In response to criticisms such as these, the Community Relations Service (CRS) of the Justice Department is in the process of signing several cooperative agreements with agencies to provide shelter care for minors apprehended by the INS.

According to guidelines set forth in the April 29 Federal Register, the shelters had to be run by licensed child welfare agencies cies and to meet or exceed "respective state guidelines and standards for similar services designed to serve children in their care and custody."

Among other requirements, agencies applying for the cooperative agreements were instructed to describe plans for education, recreation, visitation procedures, and legal and family reunification services. The Federal Register notice said that $1.5 million would be made available annually for these services. It called for shelters able to provide services for a minimum of 12-to-15 minors, but said, "The ability to provide services to a larger population of children is highly desirable."

Thus far, cooperative agreements have been signed to expand the Miami program, which has been in effect for Cuban and Haitian entrants, to include other alien children, and with Catholic Charities in Galveston/Houston, Texas.

CRS is close to implementing three more cooperative agreements in San Diego, Los Angeles, and Brownsville, Texas, and is working on another in Denver, Colorado.

The agreements currently being considered would represent places for about 100 youths. "The numbers are based on what appears to be the need," said Kenneth Leutbecker of CRS, "but we will have a better sense of the need as we go."

"CRS is making a bad situation somewhat better," said Marta Brenden, senior consultant on children in migration for Lutheran Immigration and Refugee Services, "but detention itself is inappropriate if these children are not juvenile delinquents." She added, "The criteria for these shelters sound like facilities for juvenile delinquents to me."

Enlisting private, nonprofit agencies in sheltering minors apprehended by the INS has the potential for raising other problems for the agencies themselves. While many of them are well suited to operating humane child welfare facilities, they are also expected to ensure that the minor will be presented when final orders of deportation are issued. Since most of the minors in this situation are Central American asylum seekers, collaboration with the INS is seen by many as a basic conflict with principles of protection against forced return of refugees.

In one case, Catholic Charities closed down an INS contract facility near Harlingen, Texas, because of community pressure, according to the RPG/ISS report. The report found, "People in the diocese expressed the view that an agency associated with the Catholic Church should not be facilitating deportation efforts of the INS while other Catholic groups participating in the sanctuary movement were engaged in civil disobedience against the INS."

Update

° On October 27, the Justice Department announced that it was withdrawing a proposed rule which would have eliminated the role of immigration judges in the asylum process. The move reportedly followed widespread opposition to the proposed change.

Under the current system, aliens in deportation or exclusion proceedings can raise asylum claims with immigration judges, who operate out of a Justice Department agency that is separate from the Immigration and Naturalization Service (INS). Two months ago, the Department of Justice proposed removing immigration judges from the process and creating a special team of asylum officers within INS to conduct "non-adversarial" hearings of asylum cases (see Refugee Reports, Vol. VIII, No. 9). Their decisions were to have been binding on immigration judges in deportation proceedings.

Objections to the proposal were voiced by a variety of advocacy groups, lawyers associations, and even a number of immigration judges. The changes, many argued, would deny due process to refugee applicants by leaving the final decision on an asylum case in the hands of an INS employee, the

agency responsible for enforcement and deportations.

"The more we thought about it, the more we realized that the comments were not without merit," Roger Pilon, director of the newly created Asylum Policy and Review Unit in the Justice Department, told the Washington Post. He said that immigration judges would continue in their current role, but that the Justice Department was going ahead with plans to develop a special corps of INS asylum officers.

The Justice Department is expected to publish a revised proposal by the end of the month.

° As of November 2, the State Department's Bureau for Human Rights and Humanitarian Affairs (BHRHA) is no longer providing the INS with an advisory opinion for every asylum applicant. In an October 21 letter to the INS, Edward Wilkinson, the director of the BHRHA's office of asylum affairs, said that the step was being taken for budgetary reasons.

"Our goal," said the letter, "is to address only those cases where our input would provide information not routinely available to the District Director." In some cases, Wilkinson said, a "generic" letter would be written concerning human rights conditions in the applicant's home country. Others would receive no response at all. "I want to make clear," Wilkinson said, "that our failure to respond specifically to a particular application should not be taken to mean that we believe the case to be without merit."

It appears from the letter that individualized advisory opinions will be significantly fewer in number. "In a few cases, where we feel our input would be especially helpful, we will provide an individually prepared advisory opinion," the letter said.

° Nine Laotians who were denied refugee status in Thailand were returned to Laos on October 30, according to The Nation, a Bangkok-based, English-language newspaper. They are the first group of "screened-out" Laotians to be repatriated since Thailand instituted a border screening program in July 1985, designed to separate those with valid claims to refugee status from those without.

A State Department official told Refugee Reports that the Lao government had agreed to the return of the nine, and that the UN High Commissioner for Refugees (UNHCR) would be assisting in their readjustment as well as monitoring their status.

Since 1975, more than 2,400 lowland and highland Lao have been screened out as non-refugees by Thai immigration officials. About 1,500 have been detained at the Ban Nong Saeng detention center in the north-eastern province of Nakhon Phanom. The rest are at a number of smaller sites along the Thai-Laotian border.

Thai officials said that 15 names had been approved by the Lao government for return, but only nine of the people could be found at Ban Nong Saeng. The governor of Nakhon Phanom province said that the others might be living with relatives in Thailand or had returned to Laos on their own.

The State Department reports that in the first 22 months of the screening program, 8,374 arrivals have been seen by Thai officials and 5,593 accepted. The screened-in cases are transferred to UNHCR-assisted refugee camps where they can apply for resettlement in another country.

° The Thai government has given permission for the United States to begin resettlement interviewing of up to 7,100 Cambodian "ration card holders" in Khao I Dang, a State Department official told Refugee Reports. This group entered the camp illegally between August 1984 and October 1985, but was allowed by Thai authorities to register with the UNHCR in 1985. The registration conferred legal resident status on the RCs, giving them access to rations and other camp services. They were not permitted, initially, to be interviewed for resettlement.

Earlier this year, the State Department signalled Thailand that the United States was interested in interviewing RCs in processing priorities 1 to 5.

° A severe drought in Cambodia has significantly increased the number of arrivals at the Thai-Cambodian border in recent months, according to The Nation. In the first eight months of 1987, 3,178 Cambodian arrivals were issued rice ration tickets, the UN Border Relief Operation (UNBRO) reported. During the same period last year,

2,263 ration tickets were issued, and 1,517 in 1985. The busiest months were July and August when 1,170 new arrivals were counted.

An UNBRO official said that most of the new arrivals came to Site 2, a camp of 160,000 run by the Khmer People's National Liberation Front, and to Site B, home to 42,000 followers of Prince Norodom Sihanouk. Most of the arrivals are from the provinces of Battambang and Siem Reap in western Cambodia, the official said. There are 268,000 Cambodian "displaced persons" living in nine encampments along the Thai-Cambodian border.

° On November 5, Sen. Joseph R. Biden, Jr. (D-Del.) introduced a bill to implement the International Convention on the Prevention and Punishment of Genocide. The original convention was drafted by the United Nations at the end of World War II. Only last year, the Senate voted, 83 to 11, to approve ratification of the convention, subject to several provisions, one of which required that implementing legislation be drafted prior to ratification.

"This bill provides protection to members of any national, ethnic, racial, or religious group by creating a new Federal crime of genocide or attempted genocide for any person who attempts to destroy such a group--in whole or in part--through murder, serious bodily injury, mental or physical torture, prevention of members of the group from having children, or forcible removal of children from the control of any member of the group," Biden said. Any offense that resulted in death would be punishable by life imprisonment, a fine of no more than $1 million, or both.

A New York-based human rights group, the Cambodia Documentation Commission, began a campaign in April to try the Khmer Rouge for genocide before the International Court of Justice. The commission has estimated that the Khmer Rouge, who ruled Cambodia from 1975 to 1979, are responsible for the deaths of two to three million people. "Those who were primarily responsible for perpetrating those acts remain active in international and Cambodian life," said commission director, David Hawk. "This is an ongoing violation of the articles of the convention that require those who commit genocide to be punished."

Co-sponsors of the Senate bill, S. 1851, include Sens. William Proxmire (D-Wis.) and Howard Metzenbaum (D-Ohio). Identical legislation, H.R. 807, was introduced earlier this year in the House of Representatives by Rep. Peter Rodino, Jr. (D-N.J.).

° Correction: In our last issue, we incorrectly reported the dates for INS interviewing in the Sudan. The dates should have been October 27 to November 10.

Recent Developments

ORR PROPOSES REDUCED TIME FRAME FOR REFUGEE CASH AND MEDICAL ASSISTANCE

In a move to save an estimated $14 million and to provide newly arriving refugees with "stronger incentives" to gain employment as soon as possible, the federal Office of Refugee Resettlement (ORR) has published a proposed rule change to reduce the period of eligibility for special refugee cash and medical assistance programs from 18 to 12 months.

In 1982, ORR amended regulations to reduce federal coverage to 18 months for refugees who met financial criteria for cash and medical assistance but who did not meet AFDC (Aid to Families with Dependent Children) family-composition requirements or the SSI (Supplemental Security Income) age and disability requirements. These refugee-specific programs are called RCA, or refugee cash assistance, and RMA, refugee medical assistance. The new ORR proposed rule would further reduce that 18-month period to 12 months.

Under the current program, 31 months of federal reimbursement are available to states for the costs of cash and medical assistance provided to refugees who meet all of the AFDC or SSI eligibility criteria. This includes single-parent families, families in which both parents are unemployed, refugees who are 65 years of age or older, and those who are blind or disabled.

Fiscal reductions imposed last year by the Gramm-Rudman-Hollings budget control act brought the eligibility period down from 36 months.

The proposed regulation, published in the October 19 Federal Register (Vol. 52,

No. 201), would still allow for federal reimbursement to states for assistance costs incurred from the 13th month to the 31st, but only if refugees are eligible for state or local general assistance (GA) programs. Such programs are usually quite limited in scope.

"GA is the worst form of assistance you can provide," said Andy Anh, director of the Economic and Employment Development Center in Los Angeles. "If you throw refugees into that kind of program you will discourage them forever." Anh objected to the proposed reduction, saying that "11 or 12 months is too short a time to get adjusted and to acquire job skills. That extra six months means a lot."

As of June 1987, there were 6,305 people receiving refugee cash assistance, according to Fred Schack, chief of the refugee support management bureau for the Office of Refugee Services in Sacramento. General assistance programs are county-run, said Schack, and benefit levels vary. But, on average, they are "about the same" as AFDC benefits. Job registration and participation requirements, however, are "stringent," he noted. Normally, payment checks must be picked up in person every week, and, in some counties, GA payments are considered loans which must be repaid by doing work for the county.

According to Schack, the rule change would reduce California's RCA caseload by one-third. Roughly ten percent of this group would end up in general assistance programs, he estimated.

In addition to achieving an estimated net savings of $14 million, ORR has argued that the reduction is needed to promote rapid self-sufficiency and "to reduce the degree of special treatment afforded to refugees, which results in unequal treatment among low-income populations."

ORR officials estimate that, as of December 1986, there were 27,221 RCA recipients nationwide.

Comments on the proposed rule are due by December 3 and should be addressed to Bill F. Gee, Director, Office of Refugee Resettlement, Department of Health and Human Services, Room 1229 Switzer Building, 330 C Street SW, Washington, DC 20201.

ORR Notes Slight Rise in Welfare Rates

In its report to Congress for FY 86, ORR noted that about 57.4 percent of refugees who had been in the United States 31 months or less were receiving some form of cash assistance at the end of FY 86. One year earlier, the figure was 55.5 percent but this was based on a period of 36 months. "The reason for the increase," the report said, "can be attributed largely to the reduction from 36 to 31 months and the corresponding calculation for dependency on a more recently arrived population."

Despite the slight overall increase in cash assistance rates, seven of the 18 states with the largest populations of Southeast Asian refugees (10,000 or more) showed declining rates, according to the ORR report.

State	Percentage Point Drop in Dependency Rate
California	-3.2%
Kansas	-4.4%
Louisiana	-2.4%
Maryland	-2.3%
Massachusetts	-8.0%
Oregon	-13.7%
Pennsylvania	-5.6%

"One possible explanation for the dependency rate declines for Oregon and California," suggested the report, "is that both states have been operating demonstrations over the last year to reduce reliance on welfare and to encourage early employment." Cash assistance rates for FY 87 are not yet available.

JUSTICE, STATE DEPARTMENTS DIFFER ON SAFE HAVEN BILL

In an unusual development, the Justice Department and the State Department broke ranks with each other in an October 28 House refugee subcommittee hearing on a bill to authorize the granting of temporary safe haven.

State Department support for and Justice Department opposition to the same bill continues the conflict between the two agencies on the issue of safe haven. That conflict has been evident during the past year, including earlier flaps over whether or not to grant EVD for Salvadorans and Poles (see

Message from the Editor

Dear Friends,

All of us here at Refugee Reports thank you for your wonderful response to our reader survey--by far the best response we've ever had. You taught us much. We know more about who you are and what you expect from us. We have enjoyed your compliments, and are taking your comments and suggestions very seriously.

Some of you asked that we share some of our impressions from the survey with you. We learned that a third of our subscribers are associated with local or national voluntary agencies; another third are with local, state, or national government agencies; fourteen percent of you subscribe as individuals; the rest are smaller percentages of refugee mutual assistance associations, the media, libraries, and human rights organizations.

While most of you have a strong interest in Southeast Asian refugees, we learned that more than 80 percent approve of our expanded coverage of others from Central America, Africa, the Middle East, and South Asia.

In fact, your comments suggest you want more information in general--especially concerning refugee camp conditions, health and mental health topics, employment, U.S. asylum policies, and legislation. You asked for more current research, more "investigative reporting," more resources, and statistics. As needed, we have expanded our issues to twenty pages to meet this demand.

Your suggestions included supplying information on conferences well in advance. We agree, and ask that if you are planning a conference to let us know as early as possible. You ask for more graphics. Said one reader, "Seeing a picture or a chart can help me synthesize the information in a story more quickly. It stays with me longer." We'll work on that.

Nearly 85 percent of you said you preferred monthly rather than twice-monthly issues, and that adding a special first-class mail category was not necessary. Most said you had not had a problem with your subscription. We hope you will let us know about any problems you might encounter. Carolyn Moore, our distribution manager here in Washington, wants to ensure that our printing company in Nashville, Tennessee, is responding promptly to your subscription inquiries.

Finally, in one sense, we were pleased to learn that the average subscriber shares each issue of Refugee Reports with 10 other readers. It is heartening to know that each month we reach at least 20,000 people. Still, for many of you, this is the time to renew, and we'd ask you to consider whether multiple copies (at our rate of $20.00) might help you disseminate our information more quickly. Said one reader, "I like what you do, but by the time it gets around the office, it's a month old." Remember, each additional subscription means an extra copy of the U.S. Committee for Refugees World Refugee Survey and issue papers for your use.

You might also consider giving Refugee Reports as a gift to colleagues or individuals in your community who have offered their time to refugees, and would appreciate the information we provide. We think we're a bargain, and many of you told us you agree, saying you appreciate the low cover price.

On behalf of staff writers Bill Frelick and Court Robinson; Koula Papanicolas, our production manager; and distribution manager Carolyn Moore, thank you for sharing your ideas with us. Don't hesitate to write or call with others.

Sincerely,

Virginia Hamilton

Virginia Hamilton
Editor

Refugee Reports, Vol. VIII, No. 7).

While the State Department termed the bill, H.R. 2922, "a reasonable and effective means of dealing with a very important humanitarian issue," the Justice Department opposed it, saying that current administrative procedures can deal adequately with those in need of temporary safe haven, but that giving those procedures the force of law would create a "magnet effect" that would "encourage high levels of continuing illegal entry by people from Central America."

The bill, introduced by Rep. Romano L. Mazzoli, chairman of the House subcommittee on immigration, refugees, and international law, would authorize the Attorney General to grant extended voluntary departure (EVD)--a temporary safe haven--upon determining any of three conditions to exist in the foreign nationals' homeland:

- physical danger due to armed conflict;
- environmental disaster; or
- U.S. national interest, taking into account international, humanitarian, and immigration concerns.

Ambassador Richard Schifter, assistant secretary of state for human rights and humanitarian affairs, said that the bill would "fill the gap that exists in our current immigration laws between the treatment of immigrants on the one hand and refugees and those seeking asylum on the other."

Delia Combs, associate commissioner in the Immigration and Naturalization Service (INS) division of asylum and parole, said, however, that the "INS takes issue with the idea that there is a gap that needs to be filled."

Combs added that INS's experience with earlier nationality groups granted EVD suggested that aliens would not voluntarily return after the end of the temporary safe haven grant.

State Proposes Amendments to Ensure Temporary Duration of EVD Schifter qualified the State Department's support for the bill, recommending that it be amended to include provisions to ensure "that temporary safe haven remains temporary." Among the amendments proposed was the individual registration of safe-haven recipients; a limited time at the start of each safe-haven period for aliens to register with the INS; annual re-registration of safe haven recipients for the duration of the EVD designation; time-limited work permits; no possibility of permanent adjustment of status; consultations with Congress before any continuation of EVD; a short initial safe-haven period; and a limit (suggested at 36 months) on the total EVD period for any country.

Rep. Hamilton Fish, Jr. (R-N.Y.) observed that 5 of the 8 amendments suggested by the State Department were already included in the bill. Fish said, "I don't subscribe to the theory that the Attorney General would bow to pressure" if EVD was statutorily authorized, because "this bill still gives him sole discretion" to grant temporary safe haven.

Rep. Bruce A. Morrison (D-Conn.) asked Combs why the Justice Department thought it was preferable not to have a clearly understood, legal basis for the exercise of the Attorney General's discretion. "Why should this be left to an ad hoc procedure," he asked, "as opposed to codifying criteria?"

Combs answered that "creating statutory provisions for temporary safe haven" would "raise expectations" on the part of aliens from countries in turmoil that EVD would be frequently invoked. This, she argued, could result in increased numbers entering the United States "in the hopes that EVD determination will be made in the future."

Rep. Barney Frank (D-Mass.) discussed the impact of ad hoc determinations in foreign policy terms. He said, "We can say that giving EVD status is not meant to be a negative political statement about the government in question, but it raises an inevitable conflict" between the humanitarian impulse to identify a problem and the foreign policy concern not to embarrass an ally by publicly acknowledging its problem. Frank suggested that a more regularized basis for determining EVD would deflect this negative judgment, and that the current ad hoc approach carries greater political consequences.

Frank asked Schifter to clarify the status of Nicaraguan nationals in light of the Attorney General's announcement that Nicaraguans with a well-founded fear of persecution would not be deported (see Refugee Reports, Vol. VIII, Nos. 7 and 8). Schifter responded, "I read that statement by the Attorney General. Let me simply say I would be clearer if the INS would explain."

Combs said that the administration is

opposed to EVD for both Salvadorans and Nicaraguans and that "the Attorney General's directive on Nicaraguans applies to all nationalities."

Private Sector Experts Comment Doris Meissner, senior associate at the Carnegie Endowment for International Peace, testified that the basic flaw in the bill "inherent in the concept of safe haven itself" is the notion that the political crises creating the need for safe haven will be temporary. Meissner said that legislating a temporary safe haven is often unrealistic, because "political crises are often protracted," and normalcy often does not return in the short term.

Meissner suggested a means to allow safe haven recipients in the United States for 10 or 15 years to adjust their status. "After a certain time," she said, "it is more important to allow individuals to 'join up' and fully belong to the society than to maintain a legal principle that has become divorced from reality."

Arthur Helton, director of the Political Asylum Project of the Lawyers Committee for Human Rights, recommended that safe haven determinations be included in the annual refugee consultations between Congress and the administration in order to make refugee, asylum, and safe haven policy more comprehensive. He suggested that consultation with Congress would "narrow the near absolute discretion of the Attorney General" and "lead to less arbitrary results."

Dennis Gallagher, executive director of the Refugee Policy Group and co-author of Safe Haven: Policy Responses to Refugee-Like Situations (see Refugee Reports, Vol. VIII, No. 8), challenged the idea that safe haven should always be within the Attorney General's discretion. "We feel criteria and standards should be developed requiring that safe haven be granted when they are met," he said. Gallagher questioned whether the bill would bring about any improvement. "If this discretion is not reduced," he said, "if expectations are not spelled out regarding the kind of situations which would merit safe haven, then why is there any reason to believe that future situations will be handled better than those of the recent past?"

Roger Conner, executive director of the Federation for American Immigration Reform (FAIR), said, "There is nothing so permanent as a temporary resident." He argued that a temporary safe-haven program would have permanent immigration results and would act as a magnet for future illegal immigration.

Current Research

ORR PROGRAMS EVALUATED FOR HARD-TO-PLACE REFUGEES

The training and placement of refugees who have difficulty in finding jobs have become a central challenge to U.S. policymakers and service providers alike.

Their success in integrating refugees into American life is often gauged by the progress of the lowest denominator of the refugee population--the hard-to-place--refugees from large families, dependent on public assistance, and with especially low English and job skills.

Two studies made available by the Office of Refugee Resettlement (ORR) in the Department of Health and Human Services evaluate the success of federally funded programs for these difficult cases.

The first study, written by the Research Management Corporation, evaluates the effectiveness of the targeted assistance program in reaching this group. The program has provided funds to 44 counties with unusually large refugee populations and particularly high refugee use of public assistance.

Hard-To-Place Don't Fit Cost-Benefit Equation At the outset, the researchers found that very few of the targeted assistance programs were serving hard-to-place clients. They described a process of "creaming", whereby service providers or policymakers would determine it to be more efficient to expend limited resources on better qualified refugees with more chance of job placement. Spending less time, money, and effort on people with better skills would allow agencies to place and serve more clients. The competitive bidding process for contracts or subcontracts encourages this tendency, according to the report. The bottom-line of most contract awards is number of job placements and cost. Contracting agencies, the report notes, expect the most placements possible for a given cost.

Another reason the service delivery system neglects the hard-to-place, according to the evaluation, is a perception that ORR itself is not anxious to expend funds for training and placement of these refugees. "Statements that have appeared in ORR memoranda, in printed statements attributed to ORR officials at the central or regional levels, or in ORR officials' presentations at regional meetings which criticized early results and high costs have been interpreted by many state and country level personnel to mean that more placements for less cost are desired and to be promoted." The study found ORR's emphasis on maximizing direct employment services and minimizing social and other supportive services to discourage providers from helping the hard-to-place.

Those targeted assistance projects that were successful in placing these refugees usually had an explicit focus on them. The report said that a focused effort at the county or state level was essential to successfully serving them.

The researchers found that employment services were improved when a broad range of support services were available, as well. These included personal and family counseling, assistance with childcare and transportation, as well as translation, interpretation, and legal advocacy. "What is important is that the clients have easy and regular access to these services and not have to proceed through complex bureaucratic channels, the slightest of which will deter many refugee clients."

The study recommends that ORR promote flexibility in social services complementing employment services. According to ORR policy, only 15 percent of a local area's allocation can be spent for nonemployment-related services.

The study recommended, "Perhaps this 15 percent could be creatively manipulated at the state or county level, within the policy parameters, so that providers serving more hard-to-place clients can obtain more than 15 percent for the nonemployment-related services and allow the 85/15 ratio to still hold on average across all projects within that administrative jurisdiction."

Some of the problems--foremost among them the welfare system--appear to be beyond the power of ORR or any part of the refugee service delivery system to solve directly. The researchers found, "Those refugees on AFDC with large families are most often considered the hardest to place in jobs, for it is difficult for them to obtain a job that pays more than the welfare grant." They found that it is also more difficult to find jobs for the hard-to-place in states with more generous welfare policies.

The researchers found some service providers able to "take on" the welfare system by assisting clients to find alternative ways of replacing terminated or reduced welfare services that the clients still could not afford even with a job placement.

The study warns that projects focusing on the hard-to-place will have lower placement rates and higher costs per placement than other projects. This expectation, the report says, must be considered in planning project budgets, staffing, and targeted placement rates.

Discretionary Grants Projects for Hard-to-Place Encounter Difficulties Two ORR discretionary grant programs--Enhanced Skills Training (EST) and Multiple Wage Earner (MWE)--were intended to train and encourage hard-to-place refugees to enter the job market. The programs were based on a finding that refugee households with several wage earners are more likely to earn their way out of poverty than refugee families relying on a single wage earner.

The evaluation, conducted by Lewin and Associates, Berkeley Planning Associates, the Refugee Policy Group, and the American Institutes for Research, was generally critical of these projects. "Many of the discretionary projects," the report noted, "failed to recruit and/or enroll appropriate clients."

Eligible hard-to-place refugees were often not targeted at all. "At many EST projects," the evaluation noted, "eligibility criteria were defined so broadly that they included virtually any refugee who inquired about services.... At the other extreme, the MWE projects sometimes defined eligibility criteria so narrowly that unemployed wage earners were excluded from services, even though their employment was critical to household self-sufficiency."

The evaluation concluded that the objectives of these programs--to address specific skills deficits and to coordinate em-

ployment services--should be incorporated into the ongoing refugee service system, rather than through separately funded projects.

For copies of either Evaluation of ORR's Discretionary Grant Support for Enhanced Skills Training and Multiple Wage Earners or Evaluation of the Refugee Targeted Assistance Grants Program: Phase II, Final Report, contact Toyo Biddle at the Office of Refugee Resettlement, 330 C St. SW, Switzer Building, Room 1229, Washington, DC 20201.

Resources

REFUGEE VULNERABILITY IN MEXICO STUDIED

The absence of the term "refugee" in Mexican law, and Mexico's failure to ratify the 1951 convention and 1967 protocol relating to the status of refugees puts Central American asylum seekers in Mexico in a precarious position, according to a new study on the legal situation of refugees in that country.

"The massive presence of thousands of Central Americans in Mexico has overwhelmed Mexican law, which does not provide legal security for them," says Seeking Safe Ground: The Legal Situation of Central American Refugees in Mexico.

A grant of asylum in Mexico, the study finds, requires proof of actual persecution exclusively for political reasons. Thus, refugee protection is based on a "far narrower" definition than internationally accepted standards. In practice, the report finds, "asylum is almost never granted."

Central Americans have a particularly difficult time meeting the narrow refugee standard. "Many of them are fleeing because they fear persecution for a variety of reasons, including civil strife," the report notes. "Many cannot prove that persecution for political reasons alone has already occurred." For the overwhelming majority of Central American refugees, the authors say, applying for asylum in Mexico would be "an exercise in futility."

In addition, the book notes that statutory law gives the Mexican government wide discretion to expel aliens. Where it is deemed advisable, the report notes, foreigners, including those granted asylum, can be expelled with no legal process.

The study also looks at the lack of security for Central Americans in Mexico, particularly for those outside refugee camps, who are undocumented. It says that gaps in the law are exacerbated by the secrecy with which the government approaches refugee issues.

The authors explain that Mexican refugee policy cannot be viewed in isolation, but rather in the context of relations with Central America and the United States and their refugee policies.

Mexico has made it clear, the authors find, that it will not accept refugees deported from the United States who are rejected for U.S. asylum because they passed through Mexico on their way north. The authors also suggest that U.S. arguments for deporting refugees to Mexico are based on incorrect assumptions about the legal status of refugees in that country. "The argument that Mexico is an automatic safe haven or resettlement country for refugees who passed through on their way to the U.S. ignores both current policy and the degree to which that policy would tighten if Mexico's burden were increased."

The 82-page book, written by Joan Friedland and Jesus Rodriguez y Rodriguez, is jointly published by the Mexico-U.S. Law Institute of the University of San Diego Law School and the Legal Research Institute of the National Autonomous University of Mexico.

Seeking Safe Haven is available for $7.50, plus $1.25 for shipping. Send checks or money orders to the Mexico-U.S. Law Institute, University of San Diego Law School, Alcala Park, San Diego, CA 92110. (619) 260-4816.

WORLD REFUGEE SITUATION ASSESSED

An overview of the current world refugee landscape is provided by W.R. Smyser, former UN deputy high commissioner for refugees, in Refugees: Extended Exile.

Smyser draws on his experience at the UNHCR and as the former director of the State Department's Bureau for Refugee Programs in outlining the organizations, struc-

By now, Refugee Reports subscribers should have received a copy of the new U.S. Committee for Refugees issue paper, Uncertain Harbors: The Plight of Vietnamese Boat People. USCR is making multiple copies of the paper available to groups wishing to distribute it. Contributions to cover the costs of postage and handling are appreciated. To request copies, write or call USCR, 815 15th Street, NW, Suite 610, Washington, DC 20005 (202) 667-0782.

tures, and principles guiding international refugee protection and assistance, and in showing how the parts that make up refugee protection are interrelated and dependent on internationally balanced commitments.

He also examines major refugee populations, which he divides into "traditional refugees" and "jet people."

For the former, he examines options for voluntary repatriation, local integration (especially in Africa, where he recommends that settlements be properly integrated into local economies), and third-country resettlement. He recommends "the principle of camp clearance" for the long-staying refugees of Southeast Asia. Smyser says that "the remaining camp inhabitants that can be selected for resettlement [should be] duly apportioned among the interested participating countries and moved within a definite time period," as was done in Europe in 1959-1960.

He recommends announcing a screening process to deter a renewed refugee flow and making it clear that new arrivals will not be able to expect third country resettlement.

Western Restrictiveness Threatens Refugee Protection Worldwide Smyser observes that the "jet people," intercontinental asylum seekers, have presented a particular challenge to the industrialized democracies. He describes the growing restrictiveness of Western Europe to the new asylum seekers, but points out that no European countries are on the list of the 20 countries with the highest ratio of refugees per capita. He notes that it is the European countries, "those who are at the foundation of the international refugee structure, who are reacting with such intense concern to a flow of persons dwarfed by the number that may enter Sudan or Pakistan in a single season."

Smyser worries that European countries once granting asylum to fellow Europeans fleeing persecution are now closing their doors to more ethnically diverse groups. He warns, "If the concept of a global refugee protection and support structure is to retain any meaning, there can be no apartheid of asylum."

The impact of an eroding of commitment in Western Europe and North America threatens the entire global refugee structure,

according to Smyser. He points out that the refusal to grant asylum to those who transit through third countries could result in countries at the frontline of refugee movements refusing to allow refugees to cross their borders even temporarily.

"If it is now accepted," Smyser writes, "as at least some European countries state, that any stop in any country or airport en route should be regarded as the equivalent of an asylum grant or at least as an opportunity to request asylum, it would make every refugee movement past the first stop 'irregular' and, by implication, improper travel." He concludes, "It would place an unbearably heavy human and political load on the states contiguous to any country suffering an exodus and could almost compel them to return refugees forcibly."

Refugees: Extended Exile is available for $9.95, plus $1.25 for postage and handling, from CSIS Books, Georgetown University, 1800 K St., NW, Suite 400, Washington, DC 20006. (202) 887-0200.

CONDEMNED TO A LIFETIME OF DETENTION?

"Refugees are treated as prisoners of war at Shelembod refugee camp," according to an Ethiopian refugee who spent several years in the camp in Somalia. Although the 360 refugees in Shelembod--mostly Amharas--are only a fraction of the several hundred thousand Ethiopian refugees that Somalia has taken in, they have not been granted the rights it accords other refugees. Those Amharas who arrived in Somalia between 1977 and 1982 were arrested and imprisoned. Later, they, many of the Amharas who followed, and other refugees whom the Somalia authorities considered a possible threat to the security of Somalia, were confined at Shelembod.

"The resentment which Somalis feel towards Amharas is deeply rooted in the history of the two peoples. Yet, these individual refugees...cannot be held accountable for the policies or actions of Ethiopia's past or present governments," says Detained in Exile: Ethiopians in Somalia's Shelembod Camp, an issue brief prepared by the U.S. Committee for Refugees. The report details the history of Shelembod camp and describes the problems of the refugees placed there.

The report also brings to light the imprisonment of as many as 2,800 Ethiopian civilians at Haway, a prison camp whose very existence the Somali authorities deny. Those imprisoned at Haway, including many women and children, are Amhara civilians captured by the Somalis during their 1977 invasion of the disputed Ogaden region of Ethiopia. International agencies have never been allowed to visit Haway.

The USCR report calls upon the government of Somalia to facilitate the resettlement to third countries of eligible refugees in Shelembod. It urges the Somali government to allow the ICRC and UNHCR access to Haway prison camp.

The report is available for $2.00 postage and handling from USCR, 815 15th Street, NW, Suite 610, Washington, DC 20005.

Statement of Ownership, Management & Circulation
[Required by 39 U.S. Code 3685]

1A. Title of Publication: Refugee Reports
1B. Publication No. 08843554
2. Date of filing: 10/1/86
3. Frequency of issue: Monthly
3A. No. of issues published annually: 12
3B. Annual subscription price: $28
4. Office of publication: 95 Madison Avenue, New York, New York 10016
5. Headquarters of general business office of publisher: 95 Madison Avenue, New York, New York 10016
6. Names & addresses of publisher, editor and managing editor: Publisher, American Council for Nationalities Service (ACNS), 95 Madison Avenue, New York, New York 10016;
Editor: Virginia Hamilton (formerly James Silk), ACNS, 815 15th Street, N.W., Washington, D.C. 20005
Managing Editor: None (formerly Virginia Hamilton)
7. Owner: Non-Profit Organization, American Council for Nationalities Service, 95 Madison Avenue, New York, New York 10016.
8. Known bondholders, mortgagees and other security holders, owning or holding one percent of total amount of bonds, mortgages or other securities: None.
9. Extent and nature of circulation:

		Avg # of copies each issue during preceding 12 months	Actual # of copies of single issue published nearest to filing date
A]	Total copies [net press run]	2,227	2,225
B]	Paid circulation		
	[sales through dealers, etc.]	0	0
	[mail subs.]	1,761	1,839
C]	Total paid circulation	1,761	1,839
D]	Free distribution by mail, carrier or other means, samples, etc.	109	109
E]	Total distribution [C&D]	1,870	1,948
F]	Copies not distributed:		
	[Office use]	357	277
	[return from news agents]	0	0
G]	TOTAL	2,227	2,225

10. I certify that the statements made by me above are correct and complete.

Wells C. Klein
Publisher

Cash Assistance Dependency Among Time-Eligible Refugees
September 30, 1986, and September 30, 1985

	Estimated 31-month Refugee Population as of:	Estimated 36-month Refugee Population as of:	Dependency Rates			Estimated 31-month Refugee Population as of:	Estimated 36-month Refugee Population as of:	Dependency Rates	
	9/30/86	9/30/85	9/30/86	9/30/85		9/30/86	9/30/85	9/30/86	9/30/85
Alabama	872	942	32.3%	27.0%	Missouri	1,907	2,340	17.7	28.9
Alaska	0	0	0.0	0.0	Montana	76	77	34.2	32.5
Arizona	2,298	2,303	5.1	4.1	Nebraska	422	464	29.9	23.7
Arkansas	470	808	6.8	4.1	Nevada	727	900	22.8	15.7
California	65,853a/	65,974	86.9	90.1	New Hampshire	229	367	13.1	20.2
Colorado	2,078	2,316	32.6	27.5	New Jersey	2,451	2,969	28.8	32.9
Connecticut	2,018	2,519	24.1	20.7	New Mexico	374	450	27.3	33.1
Delaware	55	31	47.3	12.9	New York	12,522	16,201	38.0	32.4
District of Col.	443	541	5.9	8.3	North Carolina	1,478	1,778	9.4	11.0
Florida	3,788	4,606	42.1	36.8	North Dakota	369	420	18.4	23.8
Georgia	2,899	3,388	24.0	23.1	Ohio	2,419	2,816	59.9	57.4
Hawaii	747	839	60.4	71.0	Oklahoma	1,823	1,854	12.8	12.4
Idaho	845	865	12.3	23.0	Oregon	2,349	2,686	50.3	64.1
Illinois	7,343	8,415	39.0	34.3	Pennsylvania	5,202	6,620	49.2	54.8
Indiana	671	653	30.1	34.8	Rhode Island	1,659	1,600	50.9	52.4
Iowa	1,767	1,888	29.5	25.7	South Carolina	237	390	19.8	15.4
Kansas	2,172	2,620	52.2	56.6	South Dakota	294	371	7.8	8.9
Kentucky	664	676	45.2	35.1	Tennessee	1,875	1,860	23.7	26.6
Louisiana	2,228	2,903	16.0	18.4	Texas	12,198	14,654	19.5	14.6
Maine	763	936	38.0	53.3	Utah	1,770	1,939	29.5	34.0
Maryland	3,127	3,450	30.0	32.3	Vermont	156	196	57.7	23.0
Massachusetts	7,799	8,750	72.0	80.0	Virginia	5,295	6,354	32.9	28.0
Michigan	2,681	3,474	43.2	36.4	Washington	7,378	7,986	80.3	69.4
Minnesota	4,854	5,082	73.3	68.2	West Virginia	60	66	35.0	13.6
Mississippi	306	401	34.0	26.4	Wisconsin	1,933	1,924	86.4	48.2
					Wyoming	18	28	72.2	3.6
					Guam	43	36	60.5	41.7
					TOTAL U.S.	182,005	200,150	57.4%	55.5%

a/ California's estimated base population as of 9/30/86 is the sum of the estimated 36-month population of refugees eligible for California's Refugee Demonstration Project and the estimated 31-month population of other refugees. This blended estimate was necessary because the RDP caseload included people in the U.S. up to 36 months.

REFUGEE REPORTS is published monthly for $28.00 per year for one subscription, $20.00 each for two or more subscriptions to the same addressee, or $20.00 each for ten or more subscriptions requested at the same time, mailed to separate addresses, overseas postage, $24.00 additional; by ACNS, 95 Madison Avenue, Third Floor, New York, NY 10016. Application to mail at 2nd class postage rates is pending at New York and additional mailing offices. POSTMASTER: send address changes to *Refugee Reports*, Sunbelt Fulfillment Services, P.O. Box 41094, Nashville, TN 37204.

Editorial comments and inquiries should be sent to: *Refugee Reports*, 815 Fifteenth Street NW, Suite 610, Washington, DC 20005. All communications regarding subscriptions should be sent to: Refugee Reports Subscriptions, Sunbelt Fulfillment Services, P.O. Box 41094, Nashville, TN 37204. (615) 377-3322.

Basic subscription rate for 12 issues per year: $28.00; Multiple-copy rate: $20.00; Single copies of back issues: $2.50.
Editor: Virginia Hamilton; Staff Writers: Bill Frelick, Court Robinson
Production Coordinator: Koula Papanicolas.
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Refugee Reports

A Project of the American Council
for Nationalities Service
Sunbelt Fulfillment Services
P.O. Box 41094
Nashville, TN 37204

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